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April 1, 2020

Via ECF

Honorable Rosemary Gambardella, U.S.B.J.  
Martin Luther King Jr. Federal Building and U.S. Courthouse  
United States Bankruptcy Court  
50 Walnut Street  
Newark, New Jersey 07102  
Courtroom 3E

RE: 19-31339-RG  
BONNIE ROTHENBERGER  
Objection to Nationstar Mortgage / Mr. Cooper's Motion for Relief From Stay

Dear Judge Gambardella:

Please accept this letter as an objection to the Motion for Relief from Stay filed by Nationstar Mortgage / Mr. Cooper. The debtor disputes Nationstar Mortgage / Mr. Cooper's assertion that Nationstar Mortgage / Mr. Cooper is not adequately protected as the debtor has been making monthly adequate protection payments of approximately 2,500.00 per month to the movant.

I have not been able to meet with the debtor to formalize a certification of opposition because of the ongoing situation regarding the coronavirus but have spoken to the debtor since the filing of this motion. I advised her that I would object by letter in lieu of an in-person meeting.

I respectfully request the Court grant an adjournment of this matter as it is my belief that the only month possible outstanding with regard to adequate protection is March 2020.

Respectfully,

A handwritten signature in blue ink, appearing to read "Avram White", is written over a horizontal line.

Avram White, Esq.